

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 21-cr-00157
Hon. JEFFREY J. HELMICK

SIR MAEJOR PAGE,

Defendant.

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DEFENSE COUNSEL'S UNOPPOSED MOTION TO WITHDRAW
AND TO APPOINT COUNSEL

NOW COMES attorney Sanford A. Schulman, the Undersigned Counsel for the Defendant SIR MAEJOR PAGE in the pending matter and submits this unopposed Motion to Withdraw as the attorney of record and to appoint counsel for the defendant for the following reasons:

1. The defendant, SIR MAEJOR PAGE was originally charged by way of Criminal Complaint and later by way of an Indictment with Wire Fraud and Money Laundering. (R. 1, Criminal Complaint and R. 15, Indictment).

2. At the time of his initial appearance on September 25, 2020, the defendant waived his right to a Preliminary Hearing, was released on a \$10,000.00 unsecured bond and based on his Financial Affidavit was appointed Neil S. McElroy as his attorney pursuant to the Criminal Justice Act (CJA). (R. 4, Appearance Bond).

3. On March 17, 2021, the undersigned filed a Motion to Appear Pro Hac Vice and an Order Granting that motion was entered at a hearing on March 17, 2021. (R. 16, Motion for Admission PHV and Order).

4. A protective order for the discovery was entered by stipulation on April 19, 2021. (R. 18, Stipulation for Protective Order). The defendant and the undersigned met several times in person and by zoom conference in Detroit and Toledo to review the discovery, guidelines, discuss a possible plea and discuss trial rights.

5. Pretrial conferences were held on August 3, 2021, September 1, 2021, and September 15, 2021 and the parties and counsel explored a resolution. This Court scheduled an in-person pretrial on September 28, 2021 at which time it

became apparent that there was a break-down in the communication between the defendant and counsel.

6. At a hearing on September 29, 2021 which was scheduled as a change of plea hearing, the defendant represented to the court that he wanted this court to grant a motion to allow defense counsel to withdraw and to appoint counsel. There has clearly been a break-down in the

7. The defendant seeks to withdraw the undersigned as counsel and pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A, the appointment of counsel. United States v. Anderson, No. 3:19-CR-220-TAV-DCP-3, 2021 U.S. Dist. LEXIS 6616 (E.D. Tenn. Jan. 13, 2021).

8. The Government expressed no objection to the request but noted that this will be the defendant's third attorney.

9. The defendant is indigent and unable to afford counsel and filed under seal is a Financial Affidavit (CJA 23).

WHEREFORE, the Undersigned Counsel for the Defendant SIR MAEJOR PAGE requests this court grant this unopposed Motion to Withdraw as the attorney of record and to appoint counsel for the defendant for the reasons so stated herein.

Respectfully submitted,

/s/ Sanford A. Schulman
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